

# **Girard Consulting Partners**

Telecom Technology Experts

For billing inquiries, please contact: Gregory Girard 23B Bridge Street Manchester-by-the-Sea, MA 01944

Tel: (978) 764-5196

ggirard@girardcp.com

Date: December 28, 2005

## **INVOICE No. 1649**

## Invoice To:

Mrs. Cherie Chaffee 18 Kingsley Ave. North Kingstown, RI 02852

<sup>C/O</sup> Mr. Jim Currier 128 Dorrance Street, Suite 400 Providence, RI 02903

ATTN: Mr. Jim Currier

#### **Matter:**

Coxcom, Inc. d/b/a COX Communications New England v. Jon Chaffee, individually and d/b/a Chaffee International, Amy Chaffee, individually and d/b/a Electronic Imports, Ramalda Bou, individually and d/b/a Electronic Imports

United States District Court for the District of Rhode Island Civil Action No. 05-107

#### **INVOICE FOR SERVICES RENDERED** FROM NOV. 1, 2005 TO DEC. 28, 2005

DATE	DESCRIPTION	Hours
11-10-2005	Research related to inquiry into Motorola R&D Motorola patent search related to set-top box design; research related to Motorola set-top box HW & SW architecture; research related to Sea Change International (PPV technology); Call to Bob Jones, Motorola support for set-top box.	4.50
11-14-2005	Teleconference with J. Currier; teleconference with C. Chaffee; various calls to Motorola; research related to High Pass Filter market size; preparation for teleconference with Motorola R&D regarding set-top box design and security features; teleconference with Bob Jones and Mark Rubinsky at Motorola R&D facility in Horsham, PA.	5.00
11-15-2005	Continue ongoing research related to High Pass Filter market size, including search for sales figures; respond to e-mails from C. Chaffe; update High Pass Filter Applications chart to incorporate additional information and e-mail to J. Currier.	2.00
11-16-2005	Research related to High Pass Filter devices manufactured by Motorola; reformat High Pass Filter datasheets to be included as PDF attachments to High Pass Filter Applications chart.	2.50
11-17-2005	Add new information to High Pass Filter Applications chart and incorporate PDF attachments by reference, then e-mail chart and attachments to J. Currier; review Expert Report of Stan Durey, specifically claims related to purpose of High Pass Filter devices.	2.00
11-18-2005	Respond to e-mail from C. Chaffee; refine and test assumptions related to effects of High Pass Filters on centralized PPV billing record collection; continue ongoing research related to High Pass Filter market size, including search for sales figures	1.75
11-19-2005	Respond to e-mail from C. Chaffee; analysis of Stan Durey's professional background; research to locate Stan Durey work products and statements that may relate to this matter; research to locate papers, articles, reports, studies, advertisements, and other potential sources of published statements by Cox security staff and executives expressing views that may relate to this matter.	2.00

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11-20-2005	Investigate activities, members, events, and points of view expressed on National Cable & Telecommunications Association website (NCTA is principal industry	5.50
	organization for Cox and other cable system operators); study results of two NCTA commissioned studies on cable theft; study NCTA extracts of Federal statutes that apply to cable theft and analyze impact on allegations in Cox Complaint.	
11-26-2005	Continue research to locate papers, articles, reports, studies, advertisements, and other potential sources of published statements by Cox security staff and executives expressing views that may relate to this matter; consolidated located information, extracting quotes and attributing to appropriate sources.	2.00
11-27-2005	Analysis of various methods of cable theft and relative contributions to industry claims of loss due to cable theft; comparative analysis of cable theft methods used on analog cable networks versus digital cable networks.	2.00
11-28-2005	Begin prep for expert report by creating brief summary of opinions; attempt to validate opinions by requesting Lou Marcoux (Cox NE security supervisor) to comment on them (no reply); downloaded full text of Federal statutes cited by Cox Complaint and initiated in-depth analysis of statutes cited by Cox Complaint.	4.00
11-29-2005	Respond to e-mail from C. Chaffee and others; teleconference with C. Chaffee; continue in-depth analysis of statutes cited by Cox Complaint.	4.00
12-2-2005	Continue in-depth analysis of statutes cited by Cox Complaint.	1.00
12-3-2005	Research definitions of key legal terms, including "communications service" and "cable service" by analyzing usage in FCC proceedings, related Federal telecommunications statutes, and FCC regulatory guidelines; determine disposition of billing and administrative services as compared to communications services; analyze impact of clarified definitions when applied to Cox Complaint.	5.00
12-4-2005	Continue to analyze impact of clarified definitions when applied to Cox Complaint.	4.00
12-8-2005	Continue in-depth analysis of statutes cited by Cox Complaint; create document structure and method of response to selected allegations; write up and incorporate interpretation of applicable Federal statutes into document.	4.50
12-9-2005	Continue in-depth analysis of statutes cited by Cox Complaint; select allegations for response and incorporate full text into document.	5.50
12-10-2005	Continue in-depth analysis of statutes cited by Cox Complaint; respond to selected allegations with technical narratives citing claims in allegations.	6.50
12-11-2005	Continue in-depth analysis of statutes cited by Cox Complaint; respond to selected allegations with technical narratives citing claims in allegations.	7.00
12-12-2005	Continue in-depth analysis of statutes cited by Cox Complaint; respond to selected allegations with technical narratives citing claims in allegations.	5.50
12-13-2005	Continue in-depth analysis of statutes cited by Cox Complaint; revise interpretations of applicable Federal statutes and technical narratives.	8.00
2-14-2005	Complete general revision of "in-depth analysis of statutes" so as to be suitable for release; convert to PDF format and file with referenced exhibits 1-4; e-mail main document and exhibits to J. Currier.	3.50
2-15-2005	Examine version of "in-depth analysis of statutes" document as received via facsimile from J. Currier. Select document template for Expert Report and begin required modifications.	1.00
12-16-2005	Incorporate selected technical narratives from "in-depth analysis of statutes" into a Summary of Opinions; update Expert Report sections regarding my Assignment, Expert Qualifications, Publications and Information Considered.	8.00



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12-17-2005	Create sections on Analytical Methodology and Table of Exhibits; analyze Expert Report of Stan Durey and create section for that analysis.	8.00
12-18-2005	Complete integration of technical narratives and additional material into Summary of Opinions; underline selected statements that comprise core expert opinions.	8.00
12-19-2005	Complete general revision of Expert Report so as to be suitable for release; convert to PDF format and file with referenced exhibits 1-4; e-mail main document and exhibits to J. Currier.	7.00
	Total Hours	119.75
	Hourly Rate	\$250.00
	Billing Total For Hours	\$29,937.50
	Expense Total*	-\$23,687.75
	BILLING TOTAL FOR THIS INVOICE	\$6249.75

DATE	EXPENSE ITEMS	AMOUNT
11-9-2005	Outstanding balance from GCP Invoice #1647	\$5812.25
11-19-2005	Payment received from C. Chaffee (NOTE: negative expense item indicates credit)	-\$3000.00
12-8-2005	Payment received from C. Chaffee (NOTE: negative expense item indicates credit)	-\$11,500.00
1-23-2006	Payment received from C. Chaffee (NOTE: negative expense item indicates credit)	-\$15,000.00
	Expense Total*	-\$23,687.75

I, the undersigned, represent this to be a true invoice for all items listed above and that the billing total for this invoice is payable within 30 days to Girard Consulting Partners, 23B Bridge Street, Manchester-by-the-Sea, MA 01944.

Signature 7677157

# COXCOM, INC. d/b/a COX COMMUNICATIONS NEW ENGLAND

JON CHAFFEE, individually and d/b/a ELECTRONIC IMPORTS and CHAFFEE INTERNATIONAL, AMY CHAFFEE, individually and d/b/a ELECTRONIC IMPORTS, and RAMALDA BOU, individually and d/b/a ELECTRONIC IMPORTS

<u>Case No. 05 Civ. 107 S</u>

# **CERTIFICATE OF SERVICE**

I, DIANA J. SANTOS, an employee of the firm LEFKOWITZ, HOGAN & CASSELL, LLP, attorneys for the Plaintiff, CoxCom, Inc. Cox Communications New England, in the above-entitled action, hereby certify under penalty of perjury that I caused a copy of Plaintiff's Motion to File a Redacted Exhibit to be served on defendants Jon Chaffee, individually and d/b/a Electronic Imports and Chaffee International, Amy Chaffee, individually and d/b/a Electronic Imports, and Ramalda Bou, individually and d/b/a Electronic Imports (hereinafter "defendants"), by causing two true and accurate copies thereof to be placed in two separate scaled envelopes via First Class Mail (postage pre-paid) and deposited into an official depository of United States Postal Service on April 2, 2009 addressed to the defendants at the addresses set forth below:

James A. Currier, Esq. Law Offices of James A. Currier 1345 Westminster Street Providence, Rhode Island 02909

Keven A. McKenna, Esq. Attorneys at Law 23 Acom Street Providence, Rhode Island 02903

Sworn before me this day of April, 2009.

Notary Public

Michael D. Cassell
Notary Public, State of New York
No. 02CA6146773

Qualified in Suffo!k County Commission Expires May 30, 2010